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February 06, 2008

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Certification of CPNI Filing
(Section 65.2009(e) of FCC Rules)
EB Docket No. 06-36**

I hereby certify that I am an Officer of the following companies:

Company Name(s): **Polar Communications Mutual Aid Corp.
Polar Telcom, Inc.
Wolverton Telephone Company**

Address: **110 4th Street E, P.O. Box 270**
City, State: **Park River, ND 58270-0270**

I have personal knowledge that the Companies have established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules and requirements in Subpart U of Part 64 of the Federal Communications Commission's Rules (47 C.F.R. 64.2001 through 64.20011). The attached Statement of CPNI Compliance explains how the Companies' operating procedures ensure that they are in compliance with the foregoing FCC rules.

I am making this certification for the year 2007.


Signature

DAVID L. DUNNING
Company Officer

Dated: 2-6-08

Attachment

cc: Byron McCoy
Telecommunications Consumers Division, Enforcement Bureau
Federal Communications Commission
445 12th Street SW, Room 4-A233
Washington, DC 20554

Best Copy and Printing, Inc. (BCPI),
Portals II
445 12th Street SW, Room CY-B402
Washington, DC 20554

Polar Communications, Inc. Polar Cablevision, Inc. Polar Telcom, Inc. Wolverton Telephone Company

Statement of Compliance Procedures for CPNI

The operating procedures of Polar Communications Mutual Aid Corp., Polar Telcom Inc. and Wolverton Telephone Company are designed to ensure compliance with the CPNI rules applicable to them. Such procedures are as follows.

CPNI Use

- (1) We use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.
- (2) We use, disclose or permit access to CPNI to provide or market service offerings to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we share the Customer's CPNI with the affiliate that provides service to the Customer; but if a Customer subscribes to only one service category, we do not share the customer's CPNI with an affiliate without the Customer's approval.
- (3) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers.

CPNI Approvals

- (1) When Customer approval to use, disclose or permit access to Customer CPNI is required, we obtain approval through written, oral or electronic method. We maintain all records for at least one year.
- (2) Subject to "opt-out" approval requirements, we use a Customer's individually identifiable CPNI to market communications-related services to that Customer, and we disclose that CPNI to our affiliates that provide communications-related services. We also allow these to obtain access to such CPNI to market communications-related services.

CPNI Notice Requirements

- (1) We individually notify and inform each Customer of his or her right to restrict the use or disclosure of, and access to, CPNI along with a solicitation of approval, and we maintain records of that notification, whether oral or written, for at least one year.
- (2) Our notifications provide information sufficient to enable our Customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI.
- (3) We advise the Customer of the precise steps the Customer must take in order to grant or deny access to CPNI, and we clearly state that a denial of approval will not affect the provision of any services to which the Customer subscribes.
- (4) Our notifications are comprehensible, not misleading, legible, and placed in an area readily apparent to the Customer.
- (5) We do not include in the notification any statement that attempts to encourage a Customer to freeze third-party access to CPNI.
- (6) For "opt-out" approvals, our notifications satisfy (1) – (5).
- (7) In addition, for "opt-out" approvals, we provide notices to our customers every two years, and we make available to every customer a method to opt-out that is of no additional cost to the Customer and is available 24 hours a day, seven days a week. We may satisfy this requirement through a combination of methods, but we allow Customers to opt-out at no cost and whenever they choose.

Statement of Compliance Procedures for CPNI

CPNI Safeguards

- (1) We have implemented a system by which the status of a Customer's CPNI approval can be clearly established prior to the use of the CPNI.
- (2) We have trained our personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place to deal with employee failures.
- (3) We maintain a record of our own and our affiliates' sales and marketing campaigns that use Customers' CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. We retain these records for at least one year.
- (4) We have established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and we maintain compliance records for at least one year. Specifically, our sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI.
- (5) We have a corporate officer who acts as agent for the Company and signs a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures adequate to ensure compliance with applicable CPNI rules. We provide a Statement accompanying the Certificate that explains our operating procedures and demonstrates compliance with the CPNI rules.
- (6) We are prepared to provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly.

CPNI Statements

There were no events of unauthorized access to and/or distribution of our customer records by data brokers.

There were no customer complaints received in the past year concerning the unauthorized release of CPNI.

Important Notice Regarding Your Account

From time to time Polar changes its service offerings and makes available additional features and services, which may enhance and augment the services to which you are already subscribed. In order for us to determine which customers may benefit from the new services and enhancements, we will use information about your account that is within our database, legally referred to as Customer Proprietary Network Information (CPNI) unless you restrict that use in the manner described below. CPNI includes information such as which long distance carrier and plan to which you are subscribed, calling features and plans to which you are subscribed, and the associated charges for those plans. Use of this data will allow Polar to tailor its service offerings to your individual needs.

For this purpose, CPNI data will be used by Polar Communications, its subsidiaries, and affiliates only. This data will not be shared by Polar Communications with any other outside source except as necessary and required to provide the service(s) to which you are already subscribed, and unless we are legally compelled to.

You have a right under federal law to protect the confidentiality of your account information and restrict the use of CPNI data, and we have a responsibility to protect your data. To restrict the use of your CPNI data, you must contact our business office at 701-284-7221 or sales@polarcomm.com within 30 days of your receipt of this notice to request that we not utilize your CPNI data. Your denial of approval for Polar to use this data will not affect the provision of any services to which you subscribe. Your approval or denial of approval for the use of CPNI outside of the service to which you already subscribe will remain valid until you revoke or limit the approval or denial.

